

DEPARTMENT OF WATER RESOURCES

State of California

The Resources Agency

OFFICE MEMO

TO: Kathy Kelly

DATE: 10/13/98

FROM: Ed Craddock

SUBJECT: CALFED Revised Draft

The Water Conservation Office's review of the revised draft of CALFED's Water Use Efficiency Appendix follows. Our comments are restricted to agricultural and urban water use efficiency/conservation.

First, some general comments related to the analysis of water conservation potential. Staff of the WCO worked with CALFED staff to make these estimates. The numbers have changed slightly, with almost no change in the assumptions, in the revised draft after almost 1,000 written comments.. This is a credit to the good analytical work done on these estimates. These estimates are slightly higher than the options in B 1690-98 because they were not held to the cost-effectiveness test used in the Bulletin. CALFED is now showing over 8 million acre feet of applied water reduction. CALFED could provide some valuable insight by spending time and money on the analysis of environmental and third-party effects from these reductions.

2-10, paragraph 2-----Change the last sentence to, *However, most water use efficiency actions, such as irrigation scheduling, laser leveling and conversion to new irrigation methods are implemented independently by the end users without assistance from water suppliers.* (This is a very important difference between agricultural and urban programs that requires a stronger statement.)

Page 2-11, first full paragraph-----Add two sentences to the end of the paragraph to read, *The water supplier may be exempted from applying the analytical method if the EWMP is already implemented or is demonstrably innapropriate. However, the MOU does not allow exemptions from analyzing the EWMPs for measurement and pricing.* (This addition will help illustrate that measurement and pricing under the MOU requires analysis and peer review in an open planning process. It could convince some that the MOU is not as soft on these EWMPs as is portrayed by its opponents.)

Page 2-15, paragraph 4-----Change the first sentence into two separate sentences as follows, *Generally, over the past three decades, urban per capita water use has stabilized. It may have even decreased in some areas of the State.* (The urban water use data collected by the DWR shows the average statewide per capita water use was only one gpcd lower in 1997 than in pre-drought conditions).

Page 2-17, last full paragraph-----After the first sentence add the following two sentences, *The current law requires DWR to report to the legislature on December 31, 2001, and every five years thereafter, summarizing the status of plans. The report shall also identify the outstanding elements of individual plans.* Change the next sentence to, *A certification process for plans that comply with the terms of the Act would require legislative action.* (This modification adds clarification of DWR's current role in evaluating plans and action necessary for certification by some agency).

cc Bill Bennett
Dennis Letl